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Christopher Clark
3355 Summerlinn Drive
West Linn, Oregon 97068
503-453-2993

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

CHRISTOPHER L. CLARK

Plaintiff,

vs.

GC SERVICES LIMITED PARTNERSHIP, a

Texas Corporation; and JANE DOE 1;

and JANE DOE 2,

Defendants.

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CV '07 - 1548 - AA

COMPLAINT

(Violation of Fair Debt Collection
Practices Act)

JURISDICTION

1. This is an action for money damages brought by an individual consumer against GC Services Limited Partnership, herein after "GC Services", and Jane Does 1 and 2, as yet unknown individuals.
2. Jurisdiction is conferred on this Court by 15 U.S.C. § 1692 K (d).

PARTIES

3. Plaintiff, Christopher L. Clark, is a consumer and resident of the State of Oregon.
4. Defendant, GC Services, is a Texas Corporation, and is specifically licensed to transact business in Oregon, and is a debt collector within the meaning of 15 U.S.C. § 1692a(6).
5. Defendant, Jane Doe 1, is an individual. Undersigned Plaintiff will amend complaint after ascertaining Defendants true identity.

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6. Defendant, Jane Doe 2, is an individual. Undersigned Plaintiff will amend complaint after ascertaining Defendants true identity.

FACTUAL ALLEGATIONS

7. On or about September 7th, 2007, Defendant, Jane Doe 1, willfully violated U.S.C. § 1692c(B).

8. On or about September 7th, 2007, Defendant, Jane Doe 1, willfully made "false" and "misleading" statements in violation of U.S.C. § 1692(e)5

9. On or about October 9th, 2007, Defendant, Jane Doe 2, called Plaintiff in violation of 15 U.S.C. § 1692G(b).

10. On or about October 9th, 2007, Defendants failed to verify the debt in violation of 15 U.S.C. § 1692G(b).

CLAIM FOR RELIEF

11. Plaintiff realleges paragraphs 1 through 10 as though fully set fourth herein.

12. The allegations contained above constitute a violation of 15 U.S.C. § 1692.

13. As a result of the allegations contained above, Plaintiff has suffered actual damage to credit reputation, embarrassment, humiliation, frustration, loss of sleep, and agitation all to his economic and non-economic damage in the amount of \$25,000.00.

14. Pursuant to 15 U.S.C. § 1692(k), Plaintiff is entitled to statutory damages in the amount of \$3,000.00.

15. Pursuant to 15 U.S.C. § 1692(k), Plaintiff is entitled to Attorney's fees and cost in the prosecution of this action.

WHEREFORE, Plaintiff prays for relief as follows:

1. An award of statutory damages on his claim of relief in the amount of \$3,000.00;
2. An award of actual damages on his claim for relief in the amount of \$25,000.00;
3. An award of Attorneys fees incurred herein, in addition to costs and disbursements;
4. Such other relief as this Court deems just and equitable;
5. And trial by Jury is demanded.

Respectfully submitted this 16th day of October, 2007



By: Christopher Clark